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Attorneys for Defendant Forest Oil Corporation

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNION OIL CO. OF CALIFORNIA, )

)

Plaintiff, )

)

vs. )

)

FOREST OIL CORPORATION )

)

Defendant. )

)

Case No. 3:10-cv-\_\_\_\_\_ (\_\_\_\_\_)

(Superior Court No. 3AN-10-12466 CI)

**NOTICE OF REMOVAL OF ACTION  
TO THE UNITED STATES DISTRICT COURT**

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, defendant Forest Oil Corporation ("Forest Oil") gives notice that this case is hereby removed from the Superior Court for the State of Alaska, Third Judicial District at Anchorage, to the United States District Court for the District of Alaska. In support of this Notice of Removal, Forest Oil states as follows:

1. On December 2, 2010, plaintiff Union Oil Company of California ("Unocal") filed this case against Forest Oil as Case No. 3AN-10-12466-CI in the

Superior Court for the State of Alaska, Third Judicial District at Anchorage. The Summons (Ex. 1 hereto), accompanied by a copy of the Complaint (Ex. 2 hereto), was served upon Forest Oil's agent for service on the same date.

2. This is a civil action of which the district courts of the United States have original jurisdiction. This is a civil action where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States. (Complaint ¶¶ 30, 37, 38 (alleging Forest Oil is liable to Unocal for \$62,035,375.14)). Plaintiff Unocal is a California corporation (Complaint ¶ 1), and its principal place of business is in El Segundo, California. Defendant Forest Oil is a New York corporation with its principal place of business in Denver, Colorado. Accordingly, federal jurisdiction exists under 28 U.S.C. § 1332(a) and removal is appropriate under 28 U.S.C. § 1441

3. The Summons and Notice to Both Parties of Judicial Assignment and the Complaint and are all the process, pleadings and orders that have been served upon Forest Oil at this time. A true and correct copy of the Summons and Notice to Both Parties of Judicial Assignment is attached hereto as Exhibit 1. A true and correct copy of the Complaint is attached hereto as Exhibit 2.

4. This Notice of Removal is filed within thirty days after the receipt by Forest Oil, through service or otherwise, of a copy of the initial pleading setting forth the claims for relief upon which such action is based and within thirty days after the service of summons upon Forest Oil. Accordingly, this Notice of Removal is timely under 28 U.S.C. § 1446(b).

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5. Promptly upon the filing of this Notice, Defendant will serve a copy of this Notice on Plaintiff and will file a copy of this Notice with the Clerk of the Superior Court for the State of Alaska, Third Judicial District, at Anchorage, in compliance with the provisions of 28 USC §1446(d).

Dated this 9th day of December, 2010.

GROH EGGERS, LLC

Attorneys for Defendant Forest Oil Corporation

By: s/ Kenneth P. Eggers.

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By: s/ David A. Devine.

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I HEREBY CERTIFY that on December 9, 2010,  
a copy of the foregoing was served **by first class mail** on:

James N. Leik, Esq.  
PERKINS COIE LLP  
1029 W. 3rd Ave., Suite 300  
Anchorage, AK 99501

Attorneys for Plaintiff

s/ David A. Devine.